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August 4, 2015

FILED VIA ECFS

Julie A. Veach
Chief, Wireline Competition Bureau
Marlene H. Dortch, Commission Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Ex Parte Comments of the New Jersey Division of Rate Counsel**

In the Matter of Ensuring Customer Premises Equipment Backup Power for Continuity of Communications, PS Docket No. 14-174; Technology Transitions, GN Docket No. 13-5; Policies and Rules Governing Retirement Of Copper Loops by Incumbent Local Exchange Carriers, RM-11358; Special Access for Price Cap Local Exchange Carriers, WC Docket No. 05-25; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, RM-10593, Notice of Proposed Rulemaking and Declaratory Ruling, (FCC 14-185, Adopted November 21, 2014, Released November 25, 2014); and In the Matter of the Wireline Competition Bureau Short Term Network Change Notifications Filed By Verizon New Jersey, Inc., WC Docket No. 15-131.

Dear Ms. Veach and Ms. Dortch:

The New Jersey Division of Rate Counsel ("Rate Counsel") files these comments regarding the above matters.¹ Rate Counsel seeks to comment on practices of Verizon New Jersey to discontinue services to some customers and to thwart the Commission's jurisdiction to

¹/ The Division of Rate Counsel is an independent New Jersey State agency that represents and protects the interests of all utility consumers, including residential, business, commercial, and industrial entities. The Rate Counsel, formerly known as the New Jersey Ratepayer Advocate, is in, but not of, the Department of Treasury. N.J.S.A. § 52:27EE-46 et seq.

review the discontinuance of service under 47 U.S.C. § 214. Under the guise of a “transition from copper to fiber,” Verizon is requiring certain residential customers to allow the retirement of its copper network and the substitution of fiber, but is doing so without proper notice and is disconnecting customers who do not meet the Company’s unilaterally imposed and insufficient deadlines and requirements. The Company has not sought authority to do so from either the FCC or the local regulatory authority. Rate Counsel believes that the Company may maintain that it is authorized to do so under a notice issued pursuant to 47 C.F.R. § 51.325-35. However, the governing regulation is 47 C.F.R. § 63.71, and Verizon has not complied with the requirements of that regulation. Verizon’s actions have caused significant confusion and have alarmed its customers. Rate Counsel submits that public safety and an orderly transition of network infrastructure from one platform to another require that the Federal Communications Commission (“FCC” and/or “Commission”) pay close attention to the actions by Verizon in New Jersey and act to ensure an orderly transition from Verizon’s copper infrastructure to Verizon’s fiber and/or fiber-optic platform.

In New Jersey, Verizon customers are alarmed, and assert that they have been blindsided by Verizon’s notification and rocket take-it or leave-it IP-Transition of their traditional telephone services. In New Jersey neither the state utility commission, the New Jersey Board of Public Utilities (“Board”) nor Verizon has provided customers with information regarding Verizon’s IP-Transition Plan in New Jersey. A Notice Letter sent by Verizon to customers in transitioning areas does not meet the requisite notice standards recommended by the FCC and threatens customers with complete disconnection of services unless they provide access to Verizon to switch them to the fiber service within 30 days. Rate Counsel knows of one disconnection that recently occurred on or about July 27, 2015. Verizon customers that have contacted Rate

Counsel regarding Verizon's Notice and IP-Transition plan have stated that they do not want to switch to the fiber product because they do not believe it is a comparable service given the likelihood of service interruption during power outages. However, based on Verizon's notice, they believe they have no choice. These customers have expressed understandable fear and alarm that non-compliance with Verizon's request will result in total disconnection of their telephone service. In addition, they are concerned that they will be charged reconnection costs if forced to return to Verizon's services if they discover that there are no other competing providers for residential service in their area. The FCC's IP-Transition Plan does not contemplate nor should it condone the tactics being employed by Verizon to migrate customers to its fiber services in New Jersey.

For these and other reasons addressed below, the FCC should take immediate action and temporarily suspend Verizon's IP-Transition plans in New Jersey pending further investigation to ensure that Verizon is providing New Jersey customers with the required notice and information mandated by the FCC before effectuating its IP-Transition.²

1. Verizon's New Jersey IP-Transition Letter Notice to customers is inadequate and impermissibly threatens disconnection of services contrary to public policy and safety.

On Friday, June 5, 2015, Rate Counsel received an email from a distressed Verizon customer inquiring about a Notice Letter, attached hereto, dated May 15, 2015. The letter announces Verizon's transition of services from copper to fiber-optic and threatens the customer

²/ On June 29, 2015, Rate Counsel asked the New Jersey Board of Public Utilities to investigate Verizon's transition and the complaints received by customers. That petition although docketed under BPU Docket No. TO15060749 has not been acted upon by the Board.

with complete service termination within 60 days if the customer fails to allow Verizon to transition the customer from its copper to fiber platform.

The consequences of inaction on the part of the customer are addressed in the letter under the heading "What happens if I do not schedule an appointment?" The letter states:

Your Verizon services will be suspended on or after 45 days from the date of this letter, if you do not allow Verizon reasonable access to your premises to install, maintain, or replace equipment and facilities that will enable us to move your service to our fiber-optic network. Once your service is suspended, you will only be able to call 9-1-1 and our customer service number, which is 1.800.VERIZON (1.800.837.4966). Approximately 14 days after being suspended, Verizon service at your address will be disconnected unless you allow us to move your service to our fiber-optic network.

The "Frequently Asked Questions" (FAQ) information sheet that accompanies Verizon's letter acknowledges that with the transition to fiber, Verizon's High Speed Internet service will no longer be available. With respect to customers with medical concerns, the FAQ sheet states:

If you or anyone presently and normally living in your home is seriously ill, we will not cut off your telephone service for up to 30 days during such illness provided you: (a) have a physician certify by phone or in writing that such an illness exists and that the person will be endangered if your telephone service is stopped; and (b) contact us at 1.877.439.7442 to place an order to transfer your voice service to fiber no later than thirty (30) days from the date of the attached Notice.

Customers receiving this letter, particularly those with medical concerns or concerns regarding the loss of telephone service during power outages, have expressed alarm and confusion over what rights and remedies they may have. The Notice fails to provide the customer with any information so that the customer may either contact the Board or the FCC for further information to understand the process and their rights and obligations.

This is clearly insufficient to satisfy the FCC's regulations. The governing regulation, 47 C.F.R. § 63.71 requires any domestic carrier that seeks to "discontinue, reduce or impair" service to provide notice to all affected customers. The regulation requires a dominant carrier, such as

Verizon, to advise customers of their right to object and advise them to do so within 30 days of the notice. *Id.* Verizon's notice to customers does not provide them with information regarding their right to file an objection with the FCC, and rather than advising them to submit any objections within thirty days, it advises them that their service will be cut off in thirty days.

Verizon may claim that it provided sufficient notice through the notice of network changes provided under section 51.329(a). However, that filing provides inadequate and insufficient notice to customers and was never intended to provide authority to discontinue service to residential customers. The notice is not provided in any forum that would fairly notify customers of what is about to happen, and only provides for objections to be submitted by an "information service provider or telecommunications service provider that directly interconnects with the incumbent LEC's network." *See* 47 C.F.R. § 51.333. Verizon's failure to provide proper notice denies the affected class of New Jersey customers the ability to review the planned transition and file timely comments or objections if desired as permitted under FCC regulations.

In New Jersey, the Board has not posted any information about Verizon's IP-Transition plans on the Board's website for consumers to view. Similarly, if you visit the Verizon NJ website at <http://www.verizon.com/about/community/nj.html> there is no information regarding Verizon's IP-Transition Plans in New Jersey. One has to be a highly tenacious and adept Internet researcher to turn up any information aside from random press and blogs which discuss the IP-Transition in very general terms that provide no specific information regarding the Verizon IP-Transition Plan in New Jersey. Obtaining information regarding this important transition for customers should not be so difficult. The success of the IP-Transition will depend on how transparent and clear the process is made for customers.

In complaints received by Rate Counsel, consumers have asked if Public Hearings were held to address Verizon's IP-Transition, if public notices were published in newspapers or ads displayed regarding Verizon's IP-Transition in their community. Customers are alarmed, afraid and annoyed at the manner in which Verizon IP-Transition Plan is being implemented in New Jersey. Customers and consumers in general deserve adequate public notice in order to exercise their right to make an informed choice regarding the type of services that they need or want.

Verizon's customer IP-Transition Notice also flies in the face of Commission directives that require that customer receive ample and complete information regarding a service provider's IP-transition plan and a minimum 90 days from the date of notice before migrating a customer over to the fiber platform.³ A poorly-managed tech transition raises public safety dangers that fall disproportionately upon elderly, low-income, and disabled customers.⁴ These same customers are the most vulnerable to extreme weather conditions and depend most heavily on copper TDM service, and are the least informed about the technology transition. Additionally, they often have limited access to the resources to file complaints. The Commission will not hear the concerns of these consumers unless proper notification of network changes is provided in a forum, such as broadcast or newspaper advertising that reaches them. As the Commission stated in its recent NPRM and Declaratory Ruling on the IP-Transition, the process must contain

³/ 47 CFR § 51.332(c)(2)(iv) and (f). See, Commission comments *In the Matter of Ensuring Customer Premises Equipment Backup Power for Continuity of Communications*, PS Docket No. 14-174; *Technology Transitions*, GN Docket No. 13-5; *Policies and Rules Governing Retirement Of Copper Loops by Incumbent Local Exchange Carriers*, RM-11358; *Special Access for Price Cap Local Exchange Carriers*, WC Docket No. 05-25; *AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, RM-10593, *Notice of Proposed Rulemaking and Declaratory Ruling*, (FCC 14-185, Adopted November 21, 2014, Released November 25, 2014), at pp. 55 – 56. (NPRM and Declaratory Ruling).

⁴/ Most adults 50+ prefer to get their news from print newspapers and magazines. *Social Media and Technology Use Among Adults 50+*, by Jean Koppen, AARP Research & Strategic Analysis from AARP Research, June 2010 Report at p. 5. Access at: <http://www.aarp.org/technology/social-media/info-06-2010/socmedia.html#.Vb-8gaD0TxQ.email>.

procedures to adequately inform and protect consumers who are affected by the transition.⁵ One thing is clear, the Notice provided by Verizon to New Jersey customers is wholly inadequate and jeopardizes a successful migration of services to the fiber platform and the continued assurance of safe and adequate and reliable services for customers in New Jersey.

The Commission has exceptionally broad authority in this area to ensure that proper notice is provided to customers about to undergo service transitions contemplated under the national IP-Transition Plan. Section 214(b) authorizes the Commission to “require such published notice as it shall determine.” Section 214(c) authorizes the Commission to “attach to the issuance of the certificate such terms and conditions as in its judgment the public convenience and necessity may require.” The Commission enjoys additional authority in this regard pursuant to other provisions of the Act. For example, Section 251(c)(5) imposes on ILECs “[t]he duty to provide reasonable public notice of changes in the information necessary for the transmission and routing of services using that local exchange carrier’s facilities or networks, as well as of any other changes that would affect the interoperability of those facilities and networks.”⁶ As the Commission has stated, “[W]here consumers may depend upon a service offered by a carrier, there should be a public process to evaluate a proposed discontinuance of that service before it happens...”⁷ As Verizon has failed to adequately inform its customers of its transition, it should not be permitted to disconnect or transition customers without their consent until such process has occurred.

⁵/ NPRM and Declaratory Ruling (FCC 14-185, Adopted November 21, 2014, Released November 25, 2014), summary, *supra* at fn 3, at pp.2-7, detailed pp. 3-4. See also, *Technology Transitions, et al., GN Docket No. 13-5, et al., Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative*, 29 FCC Rcd 1433, 1435, paras. 1 (2014) (Technology Transitions Order). See, *Technology Transitions Order*, 29 FCC Rcd at 1440, paras. 16-18 and at 1435-36, paras. 2-4. See also 47 U.S.C. §§ 151, 160, 201, 225, 251, 254, 255.

⁶/ 47 U.S.C. § 251(c)(5).

⁷/ NPRM and Declaratory Ruling. *Supra* at fn 3, p. 5.

2. Verizon's Transition results in the discontinuance, reduction and impairment of service and requires approval of the Commission pursuant to 47 U.S.C. Section 214.

Section 214 of the Communications Act requires that carriers receive FCC approval before they discontinue, reduce or impair a service and requires notice to both customers and Public Utility Commissions pursuant to Section 63.71. The FCC's Declaratory Ruling regarding its IP transition clearly states:

Pursuant to section 214(a) discontinuance process, telecommunications carriers— other than CMRS providers—and interconnected Voice over Internet Protocol (VoIP) providers must obtain Commission authority to discontinue interstate or foreign-service to a community or part of a community. The discontinuance rules are designed to ensure that customers are fully informed of any proposed change that will reduce or end service, to ensure appropriate oversight by the Commission of such changes, and to provide an orderly transition of service, as appropriate. This process allows the Commission to minimize harm to customers and to satisfy its obligation under the Act to protect the public interest. *Id.* at paragraphs 22-27, pp. 14-17.⁸

Because Verizon's IP-Transition in New Jersey will result in a discontinuance, reduction and/or impairment of service Verizon should have filed a section 214 Application in connection with its planned New Jersey IP-Transition with the FCC and after FCC approval should have provided notice to both customers and the Board pursuant to Section 63.71.⁹ The FCC has acknowledged that "the success of these technology transitions depends upon the technologically-neutral preservation of principles embodied in the Communications Act that have long defined the relationship between those who build and operate networks and those who use them. These principles include competition, consumer protection, universal service, and

⁸/ NPRM and Declaratory Ruling, PS Docket No. 14-174, GN Docket No. 13-5 RM-11358, WC Docket No. 05-25, RM-10593, (FCC 14-185) *supra* at *fn* 3.

⁹/ 47 C.F.R. § 63.71.

public safety and national security.”¹⁰ In determining whether a transition is subject to Section 214 approval, the Commission has stated that it will employ a functional test, not one based solely on how the carrier defines its services in its tariff.¹¹ The Commission stated in its Declaratory ruling that this functional test will seek to “identify the service the carrier actually provides to end users” and “[i]f relevant evidence indicates that the “service” provided includes features outside of the tariff definition, the Commission must under Section 214(a) treat those features as part of the “service” for which prior approval to discontinue must be sought” ((NPRM and Declaratory Ruling, pp. 49-50). The Commission ruled:

In sum, we clarify and reiterate that the Commission looks beyond the terms of a carrier’s tariff, and instead it applies a functional test that takes into account the totality of the circumstances from the perspective of the relevant community or part of a community, when analyzing whether a service is discontinued, reduced, or impaired under Section 214. We also point wireline carriers to their obligations under section 68.110(b) of our rules requiring notice to customers when changes in the provider’s facilities, equipment, operations or procedures “[if] such changes can be reasonably expected to render any customer’s terminal equipment incompatible with the communications facilities of the provider ...or require modification or alteration of such terminal equipment or otherwise materially affect its use or performance.” *Id.*, at 51

Here, customers have been informed that their High Speed Internet will no longer be operational. (*See* attached Notice). While voice service will be offered for an unstated period of time at current rates, customers seeking to continue their internet service will have to sign up for FiOS service which is generally significantly more expensive. Customers are also being informed that in the event of a power outage they will need to obtain and maintain battery backup for phone service. Battery backup will not, however, power cordless phones, alarm systems and “other devices or equipment that require power.” If a customer does not allow for the transition, his or her service will be discontinued entirely. Rate Counsel has received

¹⁰/ NPRM and Declaratory Ruling, PS Docket No. 14-174, GN Docket No. 13-5 RM-11358, WC Docket No. 05-25, RM-10593, (FCC 14-185) *supra* at *fn*s 3 and 4.

¹¹/ *Id.*, at pp. 4-5 and 48-51.

information that one New Jersey customer has already been disconnected and is not receiving any service at all from Verizon. While the Notice states generically that “[a]ny devices that rely on your current voice service, such as facsimile, security alarms connected to a central station, or medical monitoring equipment, will continue to work in the same way as they did over copper,” that statement is contradicted elsewhere in the notice where the impact of a power outage is discussed. Moreover, consumers who have reached out to Rate Counsel have stated that certain equipment they rely on, such as emergency notification buttons, or devices that allow pacemaker readings to be uploaded over their phone lines to their doctors, will no longer work. In sum, given the overall functional impact, this transition clearly represents a discontinuance, reduction or impairment of service that requires FCC approval.

Verizon may seek to argue that its Notice of Network Change in *In the Matter of the Wireline Competition Bureau Short Term Network Change Notifications Filed By Verizon New Jersey, Inc.*, WC Docket No. 15-131, is sufficient notice to allow the Commission to approve this transition. However, that Notice is inadequate and does not govern the type of change in service contemplated here. The FCC’s Public Notice in that case indicates that the “Planned Implementation Date” is “on or after September 9, 2015” and advises that the effective implementation date of these changes is subject to the FCC’s 90-day public notice period under section 51.333(b).¹² However, the Notice sent to customers indicates that Verizon’s copper to fiber transition would be effectuated within a 45-day window from the date on the letter, noting service interruption and ultimately full termination of services 15-days thereafter if arrangements were not made by the customer. Indeed, it appears Verizon is already disconnecting customers

¹²/ FCC Public Notice, *Wireline In the Matter of the Wireline Competition Bureau Short Term Network Change Notifications Filed By Verizon New Jersey, Inc.*, WC Docket No. 15-131, Report No. NCD-2459, (Rel. June 11, 2015).

even though the September 9 effective date has not yet arrived. Moreover, the Notice of Network Change was not disseminated widely and was made under section 51.329(a), which only provides for objections to be filed by an “information service provider or telecommunications service provider that directly interconnects with the incumbent LEC’s network.” It was never intended to provide authority to discontinue service to residential customers.

In its recent NPRM and Declaratory Ruling, the Commission stated that its goals are to:

- 1) Ensure reliable back-up power for consumers of IP-based voice and data services across networks that provide residential fixed service that substitutes for and improves upon the kind of traditional telephony used by people to dial 911;¹³
- 2) Protect consumers by ensuring they are informed about their choices and the services provided to them when carriers retire legacy facilities (e.g., copper networks) and seek to discontinue legacy services (e.g., basic voice service); and
- 3) Protect competition where it exists today, so that the mere change of a network facility or discontinuance of a legacy service does not deprive small- and medium-sized business, schools, libraries, and other enterprises of the ability to choose the kinds of innovative services that best suit their needs.

Rate Counsel recognizes the importance of modernizing legacy communications networks and supports the planned national IP-Transition. However, incumbent local exchange carriers such as Verizon should not be permitted to circumvent the FCC’s regulations and migrate customers from service platforms without Commission approval and without providing adequate information to the affected customers. Verizon’s heavy handed actions herein are unconscionable and potentially endanger the safety of customers who may lack sufficient information to understand or manage the transition. Network changes that impact interoperability

¹³/ NPRM and Declaratory Ruling, at p. 2, PS Docket No. 14-174, GN Docket No. 13-5 RM-11358, WC Docket No. 05-25, RM-10593, (FCC 14-185) *supra* at *fns 3 and 4*.

of the ILEC's network with end-user equipment can have significant consequences for network users if they do not have adequate notice and opportunity to prepare for the migration.¹⁴

By comparison, Rate Counsel notes that the FCC's television analog to digital broadcast switch took several years to effectuate and viewers were notified of the change through months of public service announcements, town hall meetings, and local news coverage.¹⁵ Public notice and information were key aspects of effectuating an orderly and safe transition for the public. A telecommunications carrier's transition of customers from a network that has been in place since the inception of a fundamental service such as telephone must surely be handled in the same careful manner. *See also, N.J.A.C. 14:10-12.1, et seq.* (New Jersey's mass migration rules that ensure that a carrier's planned cessation of services to customers occurs in an orderly manner, is not anti-competitive and guarantees the continuation of safe, adequate and reliable services to customers with minimal customer confusion.) In addition, voice telephone service should not be discontinued unless there is a guaranteed provider of reliable service that meets the criteria for universal voice telephone service, provides at least equivalent functionality and is reliable during emergencies and extended power outages.¹⁶ Customers should also be fully and objectively informed about the nature of the transition, what their service options are and the relevant

¹⁴/ NPRM and Declaratory Ruling, at p. 2, PS Docket No. 14-174, GN Docket No. 13-5 RM-11358, WC Docket No. 05-25, RM-10593, (FCC 14-185) *supra* at *fn*s 3 and 4.

¹⁵/ The Congressional deadline to transition to digital broadcasts was pushed back several times. Congress passed the Telecommunications Act of 1996 with the original transition date of December 31, 2006. The transition to digital television was set back several more times after that, first to December 31, 2008, then to February 17, 2009, and then finally to June 12, 2009, after several years of informing and preparing the public for the analog to digital transition. Hart, Jeffery (2011). "The Transition to Digital Television in the United States: The Endgame" (PDF). *International Journal of Digital Television* 1 (1): 7-29. doi:10.1386/jdtv.1.1.7/.

¹⁶/ In re Ensuring Customer Premises Equip. Backup Power for Continuity of Commc'ns, PS Docket No. 14-174 GN Docket No. 13-5 RM-11358 WC Docket No. 05-25 RM-10593; 29 FCC Red. 14,968 (2014) ("NOPR"). Comments of NASUCA at 7

differences in the performance, reliability, and cost characteristics of each service option.¹⁷ Such process and practice has not been employed by Verizon in New Jersey and merits immediate suspension of Verizon's IP-Transition plans throughout New Jersey until further review, investigation and direction by the FCC.

Conclusion

The FCC has embraced the challenge of helping to foster the transition of our nation's telecommunications phone system, while continuing to protect consumers and promote competition and investment.¹⁸ The FCC's directives for a carrier's IP-Transition seek to ensure continued support of 911 services and call centers, continued network capacity and reliability, quality of both voice service and Internet access, interoperability with devices and services, such as alarm services and medical monitoring devices, access and compatibility with assistive technology for people with disabilities, network security, legacy network; and coverage throughout the service area. Verizon's transition does not provide sufficient information to customers and does not satisfy the Commission's enumerated standards to ensure continued consumer protection, reliability of safe and adequate services and the promotion of competition.

For the reasons discussed above, Rate Counsel respectfully urges the Commission to issue an order and Directive suspending the pending disconnection of any customer in connection with Verizon's copper-to-fiber network transition in New Jersey pending the filing

¹⁷/ See, e.g., Comments of Public Knowledge et al. at 32-34; Comments of NASUCA at 18-19; Comments of Pa PUC at 13; Comments of NY PSC at 6-7.

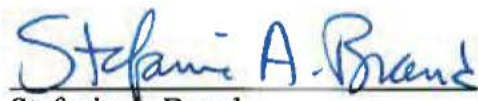
¹⁸/ *In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund*, WC Docket 10-90, et al., Report and Order And Further Notice of Proposed Rulemaking, FCC 11-161 (Rel. November 18, 2011).

by Verizon of a Section 214 Application allowing for further Commission review of Verizon's IP-Transition plan and the filing of proper notices to customers, Rate Counsel, and the New Jersey Board of Public Utilities as required under Section 63.71.

Respectfully Submitted

STEFANIE A. BRAND,
DIRECTOR

STATE OF NEW JERSEY
DIVISION OF RATE COUNSEL



Stefanie A. Brand,
Director
Maria T. Novas-Ruiz,
Assistant Deputy Rate Counsel

Dated: August 4, 2015.
cc: Service List



Rate Counsel
Attachment 1

**NOTICE OF VERIZON NETWORK UPGRADE:
IMMEDIATE CUSTOMER ACTION REQUIRED FOR CONTINUED VERIZON SERVICE**

May 15, 2015

BLOOMFIELD, NJ 07003

Dear

Telephone Number:

IMPORTANT NOTICE: This is not a sales letter. Verizon is in the process of upgrading the network in your area to our fiber-optic technology. **TO AVOID ANY DISRUPTION OF YOUR VERIZON SERVICE(S), YOU MUST CALL US AT 1.877.439.7442 WITHIN 30 DAYS OF THIS LETTER TO SCHEDULE AN APPOINTMENT.** Our goal is to make this transition as easy as possible for you.

If you have Verizon voice service, the upgrade will provide access to the same voice service you enjoy today at the same price, but over our all-fiber network. Verizon Wireless services are not affected by this upgrade.

Why do I have to call Verizon?

We are migrating our services in your area from our older copper network to our newer, more reliable fiber-optic technology. After the migration, we will no longer provide service in your area over the copper network. Our fiber-optic network allows us to provide higher quality services using a more reliable technology.

Will I have to change my current service, and will the price increase?

The upgrade to fiber-optic technology, which will be performed at no cost to you, will give you access to the same Verizon voice service you currently have at the same price. Customers with our High Speed Internet service who upgrade to fiber will be offered our FiOS Internet product at a special rate.

How do I arrange to move my service to the Verizon fiber-optic network?

Please contact us within 30 days of the date of this letter at 1.877.439.7442 to move your Verizon service to fiber. We are available Monday-Friday (8:00 a.m. - 8:00 p.m.) and Saturday (9:00 a.m. - 5:00 p.m.).

What happens if I do not schedule an appointment?

Your Verizon services will be suspended on or after 45 days from the date of this letter, if you do not allow Verizon reasonable access to your premises to install, maintain, or replace equipment and facilities that will enable us to move your service to our fiber-optic network. Once your service is suspended, you will only be able to call 9-1-1 and our customer service number, which is 1.800.VERIZON (1.800.837.4966). Approximately 14 days after being suspended, Verizon service at your address will be disconnected unless you allow us to move your service to our fiber-optic network.

What if I have additional questions?

Please review the attached Frequently Asked Questions for additional information about the fiber upgrade, including information about replacing your High Speed Internet service (if you subscribe).

Thank you for continuing to be a loyal Verizon customer. We appreciate your business. If you have already placed an order to migrate or disconnect your service, thank you and please disregard this notice.

Sincerely,

Walter Jones
VP-Business Transformation
Verizon
One Verizon Way
Basking Ridge, NJ 07920



**AVISO DE VERIZON RED DE ACTUALIZACIÓN:
ACCIÓN INMEDIATA AL CLIENTE REQUERIDA PARA SERVICIO DE VERIZON CONTINÚA**

May 15, 2015

BLOOMFIELD, NJ 07003

Querido

Telephone Number:

AVISO IMPORTANTE: Esta no es una carta de ventas. Verizon está en el proceso de mejora de la red en su área para nuestra tecnología de fibra óptica. **PARA EVITAR CUALQUIER INTERRUPCIÓN DE SU SERVICIO DE VERIZON (S), DEBE LLAMARNOS AL 1.877.439.7442 DENTRO DE 30 DÍAS DE ESTA CARTA PARA PROGRAMAR UNA CITA.** Nuestro objetivo es hacer esta transición lo más fácil posible para usted.

Si tiene el servicio de voz de Verizon, la actualización permitirá el acceso al mismo servicio de voz que disfrutan hoy por el mismo precio, pero con el paso de nuestra red totalmente de fibra óptica. Servicios de Verizon Wireless no se ven afectados por esta actualización.

¿Por qué tengo que llamar a Verizon?

Estamos migrando nuestros servicios en su área de nuestra red de más edad del cobre a nuestra tecnología de fibra óptica más nuevo, más fiable. Después de la migración, ya no podremos ofrecer un servicio en su área sobre la red de cobre. Nuestra red de fibra óptica nos permite ofrecer servicios de mayor calidad utilizando una tecnología más fiable.

¿Tendré que cambiar mi servicio actual y aumentará el precio?

La actualización a la tecnología de fibra óptica, que se lleva a cabo sin costo alguno para usted, le dará acceso al mismo servicio de voz de Verizon que tiene actualmente por el mismo precio. Los clientes con nuestro servicio de Internet de alta velocidad que actualicen a la fibra se ofrecerán nuestro producto FiOS Internet a un precio especial.

¿Cómo organizo para mover mi servicio a la red de fibra óptica de Verizon?

Póngase en contacto con nosotros dentro de los 30 días siguientes a la fecha de esta carta al 1.877.439.7442 para mover el servicio de Verizon a la fibra. Estamos disponibles de lunes a viernes (8:00 a.m. -8:00 p.m.) y sábado (9:00 a.m. -5:00 p.m.).

¿Qué sucede si no me programo una cita?

Sus servicios de Verizon se suspenderán a partir del 45 días desde la fecha de esta carta, si usted no le permite a Verizon acceso razonable a sus instalaciones para instalar, mantener o reemplazar los equipos e instalaciones que nos permitirá mover su servicio a nuestra fibra red -óptica. Una vez que su servicio se suspende, sólo podrá llamar al 9-1-1 y nuestro número de atención al cliente, que es 1.800.VERIZON (1.800.837.4966). Aproximadamente 14 días después de ser suspendido, el servicio de Verizon en su dirección se desconectará a menos que usted permite que nos movamos su servicio a nuestra red de fibra óptica.

¿Qué pasa si tengo más preguntas?

Por favor revise las Preguntas Frecuentes adjuntos para más información sobre la actualización de la fibra, incluyendo la información sobre la sustitución de su servicio de Internet de alta velocidad (si se suscribe).

Gracias por seguir siendo un cliente fiel de Verizon. Apreciamos su negocio. Si ya ha realizado un pedido a migrar o desconectar su servicio, gracias y por favor, no tener en cuenta este aviso.

Atentamente,

Walter Jones
VP-Business Transformation
Verizon
One Verizon Way
Basking Ridge, NJ 07920

VERIZON NETWORK UPGRADE: FREQUENTLY ASKED QUESTIONS

1. Will I be charged for the fiber installation or the new equipment? There is no charge for the fiber extension to your home, nor is there a charge for any necessary equipment to migrate your Verizon telephone service to fiber. If you are migrating High Speed Internet to FiOS Internet or if you purchase additional services such as FiOS TV, you may be charged for the equipment for these services depending on which you select.

2. What is the installation process? You will need to schedule an installation appointment at a time when someone 18 years or older will be home. To do that, please call us at 1.877.439.7442 (Mon-Fri, 8:00 am-8:00 pm; and Sat, 9:00-5:00 pm). You will also need to provide access to a grounded or a three-prong electrical outlet, which we need to power the equipment. We will work with you to identify a convenient installation date. On the day of installation, our technician will install the equipment and ensure that your voice service is working properly with your equipment. If you choose to subscribe to new services available on fiber such as FiOS Internet or FiOS TV, the technician will provide professional installation of those services as well. The technician will address any questions at the time of installation.

3. What equipment is needed in order for me to upgrade to the fiber network? We will extend our fiber optic network to your home, and our technician will install an Optical Network Terminal (ONT) and backup power unit (described below) for voice service at your home. The placement of this equipment will vary depending on the type of home you live in. We should be able to use the existing wiring in your home, and you will be able to use your existing telephones.

4. What is the battery backup? The battery power unit is designed to provide you with backup power for your voice service in the event of a commercial power outage. Without the backup power unit, you will not have voice service, and, if you have an alarm system, it may not be able to dial out to a central monitoring station. The backup power unit will allow you to make telephone calls on a corded telephone handset, but it will not power telephones with cordless handsets, alarm system equipment, or other devices or equipment that require power. To power those devices during a commercial power outage, you will need an alternative power source such as a generator.

5. What about 911 for emergencies? There will be no changes to the 911 emergency service as a result of upgrading to our fiber network. In the event of an extended power outage that fully depletes battery power in the backup power unit, please put in a set of new batteries in order to place telephone calls, including 911 calls, from a corded telephone handset. Or you can use an alternative, such as a cell phone, to dial 911.

6. I'm not sure I want FiOS. What are my alternatives? This is not FiOS voice service. It is your existing voice service, only provided over fiber instead of copper, at the same price, terms, and conditions. Any devices that rely on your current voice service, such as facsimile, security alarms connected to a central station, or medical monitoring equipment, will continue to work in the same way as they did over copper. For High Speed Internet customers, the product you currently have is not available on fiber, but Verizon can provide you with a FiOS Internet product that is significantly faster at a special rate. In some cases, this price may be lower or higher than what you currently pay. If you would like to speak with a representative about any of our FiOS products, please call us at 1.877.439.7442.

7. What if there is a medical emergency in my home? If you or anyone presently and normally living in your home is seriously ill, we will not cut off your telephone service for up to 30 days during such illness provided you: (a) have a physician certify by phone or in writing that such an illness exists and that the person will be endangered if your telephone service is stopped; and (b) contact us at 1.877.439.7442 to place an order to transfer your voice service to fiber no later than thirty (30) days from the date of the attached Notice.

VERIZON RED DE ACTUALIZACIÓN: PREGUNTAS FRECUENTES

1. ¿Se me cobrará por la instalación de la fibra o el nuevo equipo? No hay ningún cargo para la extensión de la fibra a su casa, ni hay una carga para cualquier equipo necesario para migrar su servicio telefónico de Verizon a la fibra. Si está migrando a Internet de alta velocidad de FiOS Internet o si usted compra servicios adicionales, tales como FiOS TV, se le puede cobrar por el equipo para estos servicios en función de que haya seleccionado.

2. ¿Cuál es el proceso de instalación? Tendrá que programar una cita de instalación en un momento en que alguien 18 años o más será el hogar. Para hacer eso, por favor llámenos al 1.877.439.7442 (de lunes a viernes, de 8:00 am-8:00 pm, y sábado, 9:00-5:00 horas). También tendrá que proporcionar acceso a una toma de tierra o un tomacorriente de tres patas, que necesitamos para alimentar el equipo. Vamos a trabajar con usted para identificar una fecha de instalación conveniente. En el día de la instalación, nuestro técnico instalará el equipo y asegurarse de que su servicio de voz funciona correctamente con su equipo. Si decide suscribirse a los nuevos servicios disponibles en fibra tales como FiOS Internet o FiOS TV, el técnico le proporcionará la instalación profesional de esos servicios. El técnico contestará cualquier pregunta en el momento de la instalación.

Se necesita 3. ¿Qué equipo para que me actualizo a la red de fibra? Vamos a ampliar nuestra red de fibra óptica en tu casa, y nuestro técnico a instalar un terminal de red óptica (ONT) y la unidad de energía de reserva (que se describe más adelante) para el servicio de voz en su casa. La colocación de este equipo puede variar dependiendo del tipo de casa donde vive. Debemos ser capaces de utilizar el cableado existente en su casa, y usted será capaz de utilizar sus teléfonos existentes.

4. ¿Cuál es la copia de seguridad de la batería? La unidad de energía de la batería está diseñada para proporcionarle energía de reserva para su servicio de voz en caso de un corte de energía comercial. Sin la unidad de energía de reserva, usted no tiene el servicio de voz, y, si usted tiene un sistema de alarma, puede no ser capaz de marcar a una estación central de monitoreo. La unidad de energía de reserva le permite hacer llamadas de teléfono en un teléfono con cable, pero no lo hará teléfonos eléctricos con auriculares inalámbricos, equipos de sistema de alarma, u otros dispositivos o equipos que requieren energía. Para alimentar estos dispositivos durante un corte de energía comercial, tendrá una fuente de energía alternativa como un generador.

5. ¿Qué pasa con el 911 para emergencias? No habrá cambios en el servicio de emergencia 911, como resultado de la actualización a nuestra red de fibra. En caso de un apagón prolongado que agota totalmente la batería en la unidad de energía de reserva, por favor, poner en un conjunto de pilas nuevas con el fin de realizar llamadas telefónicas, incluidas las llamadas al 911, desde un teléfono con cable. O puede utilizar una alternativa, como un teléfono celular, para marcar 911.

6. Yo no estoy seguro de querer FiOS. ¿Cuáles son mis alternativas? Esto no es un servicio de voz de FiOS. Es su servicio de voz existente, sólo proveído a través de fibra en lugar de cobre, al mismo precio, términos y condiciones. Los dispositivos que se basan en el servicio de voz actual, como fax, alarmas de seguridad conectados a una estación central, o equipos de monitoreo médico, continuarán trabajando de la misma manera como lo hicieron a través de cobre. Para De alta velocidad de clientes de Internet, el producto que usted tiene actualmente no está disponible en fibra, pero Verizon puede proporcionarle un producto FiOS Internet que es significativamente más rápido a un precio especial. En algunos casos, este precio puede ser menor o mayor que lo que se paga actualmente. Si usted desea hablar con un representante acerca de cualquiera de nuestros productos de FiOS, por favor llámenos al 1.877.439.7442.

7. ¿Qué pasa si hay una emergencia médica en mi casa? Si usted o alguien en la actualidad y que normalmente viven en su hogar está gravemente enfermo, no nos contamos su servicio telefónico por hasta 30 días durante dicha enfermedad siempre y cuando: (a) tiene un médico certifica por teléfono o por escrito que dicha enfermedad existe y que la persona estará en peligro si se detiene el servicio telefónico; y (b) contacte con nosotros en 1.877.439.7442 para realizar un pedido para transferir su servicio de voz a la fibra no más tarde de treinta (30) días a partir de la fecha de la Notificación adjunta.



PUBLIC NOTICE

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: <http://www.fcc.gov>
TTY 1-888-835-5322

WIRELINE COMPETITION BUREAU SHORT TERM NETWORK CHANGE NOTIFICATION FILED BY VERIZON NEW JERSEY INC.

WC Docket No. 15-131
Report No. NCD-2459

June 11, 2015

Re: SHORT TERM NETWORK CHANGE CERTIFICATION RECEIVED

Verizon New Jersey Inc., an incumbent local exchange carrier (LEC), has filed certification that short term public notice of network change(s) has been provided through its publicly accessible Internet site, as required by section 51.329(a) of the rules of the Federal Communications Commission (FCC), together with certification of service on identified interconnecting carriers, as required by section 51.333(a). Upon initial review the filing appears to be complete. See 47 C.F.R. §§ 51.325 through 51.335. Specific network change information can be obtained on the Internet at:

<http://www22.verizon.com/about/networkdisclosures/>

The incumbent LEC's certification(s) refer(s) to the change(s) identified below:

| Type of Change(s) | Location of Change(s) | Planned Implementation Date(s) |
|--|---|--------------------------------|
| Verizon plans to retire a small number of copper facilities and to provide services over its fiber-to-the-home network infrastructure. | The Bloomfield, NJ Wire Center (BLFDNJBL), the New Brunswick, NJ Wire Center (NBWKNJNB) & at facilities associated with the listed locations served by these wire centers (attached). | On or after September 9, 2015 |

Incumbent LEC contact:
Frederick E. Moacdieh
Executive Director - Federal Regulatory Affairs
Verizon
1300 I Street, N.W., Suite 400 West
Washington, D.C. 20005
Phone: (202) 515-2590

An objection to an incumbent LEC's short term notice or notice of replacement of copper loops or copper subloops with fiber-to-the-home loops or fiber-to-the-curb loops may be filed by an information service provider or telecommunications service provider that directly interconnects with the incumbent LEC's network. Such objections must be filed with the Commission, and served on the incumbent LEC, no later than the ninth business day following the release of this public notice. See 47 C.F.R. § 51.333(c). The effective implementation date of these changes is subject to the FCC's 90-day public notice period under section 51.333(b). See 47 C.F.R. § 51.333(b).

Information service providers and telecommunications service providers that directly interconnect with the incumbent LEC's network may file objections, and other interested parties may file comments,

regarding this network change notice using the Internet by accessing the ECFS: <http://apps.fcc.gov/ecfs>. Filers should follow the instructions provided on the Web site for submitting comments. Generally, only one copy of an electronic submission must be filed. In completing the transmittal screen, filers should include their full name, U.S. Postal Service mailing address, and the applicable docket or rulemaking number. Interested parties also may comment on this network change notice by sending an e-mail to NetworkChange@fcc.gov. The subject line of the e-mail must include the correct NCD Report Number or docket number in order for the comments to be considered in conjunction with this proceeding. All information submitted including names and addresses will be publicly available via the web.

Parties who choose to file paper copies must file an original and one copy of each filing. Such filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission. All hand-delivered or messenger-delivered paper filings for the Commission's Secretary must be delivered to FCC Headquarters at 445 12th Street, S.W., Room TW-A325, Washington, D.C. 20554. The filing hours are Monday through Friday, 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building. Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743. U.S. Postal Service first-class, Express, and Priority mail must be addressed to 445 12th Street, S.W., Washington, D.C. 20554.

This proceeding is considered a "permit but disclose" proceeding for purposes of the Commission's *ex parte* rules.¹ Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter's written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with rule 1.1206(b). In proceedings governed by rule 1.49(f) or for which the Commission has made available a method of electronic filing, written *ex parte* presentations and memoranda summarizing oral *ex parte* presentations, and all attachments thereto, must be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (e.g., .doc, .xml, .ppt, searchable .pdf). Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules.

The original filing is available for inspection and copying at the FCC Public Reference Room, Portals II, 445 12th Street, S.W., Suite CY-A257, Washington, D.C. 20554.

People with Disabilities: To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at (202) 418-0530 (voice), (888) 835-5322 (tty).

¹ 47 C.F.R. §§ 1.1200 *et seq.*

For further information, contact Carmell Weathers, (202) 418-2325 (voice), or **Carmell.Weathers@fcc.gov** (email), of the Competition Policy Division, Wireline Competition Bureau. The tty number is (888) 835-5322.

-FCC-

Ex Parte Comments of the New Jersey Division of Rate Counsel

IMO Ensuring Customer Premises Equipment Backup Power for Continuity of Communications, PS Docket No. 14-174; Technology Transitions, GN Docket No. 13-5; Policies and Rules Governing Retirement of Copper Loops by Incumbent Local Exchange Carriers, RM -11358; Special Access for Price Cap Local Exchange Carriers; WC Docket No. 05-25; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, RM-10593, Notice of Proposed Rulemaking and Declaratory Ruling, (FCC 14-185, Adopted November 21, 2014 Released November 25, 2014); and In the Matter of the Wireline Competition Bureau Short Term Network Change Notifications Filed by Verizon New Jersey, Inc., WC Docket No. 15-131.

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Your submission has been accepted

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| ECFS Filing Receipt - | |
| Confirmation number: 201584242518 | |
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| RM-11358 | Amend Certain Part 51 Rules |
| Contact Info | |
| Name of Filer: NJ Division of Rate Counsel | |
| Email Address: rkhan@rpa.nj.state.us | |
| Attorney/Author Name: Stefanie Brand | |
| Address | |
| Address For: Filer | |
| Address Line 1: 140 E. Front Street, 4th Fl. | |
| Address Line 2: P.O. Box 003 | |
| City: Trenton | |
| State: NEW JERSEY | |
| Zip: 08625 | |
| Details | |
| exparte: YES | |
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| Name | Subject |
| 13-5 | Task Force-related ex partes |
| Contact Info | |
| Name of Filer: NJ Division of Rate Counsel | |
| Email Address: rkhan@rpa.nj.state.us | |
| Attorney/Author Name: Stefanie Brand | |
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| State: NEW JERSEY | |
| Zip: 08625 | |
| Details | |
| exparte: YES | |
| Type of Filing: NOTICE OF EXPARTE | |
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